

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF
PENNSYLVANIA, HARRISBURG DIVISION**

IN RE:	:	
MATTHEW & AIMEE SULLIVAN	:	
DEBTOR	:	17-00670
SETURUS INC. as authorized subservicer		
For Federal National Mortgage Association. :		
Movant	:	Chapter 13
Vs.	:	
MATTHEW & AIMEE SULLIVAN	:	
Respondent		

ANSWER TO MOTION FOR RELIEF OF THE AUTOMATIC STAY

AND NOW, comes Respondents Matthew & Aimee Sullivan, by and through their attorney, Gregory S. Hazlett, Esquire, and answers this Motion for Relief from Automatic Stay:

1. ADMITTED
2. ADMITTED.
3. ADMITTED.
4. ADMITTED
5. DENIED: Counsel for the debtors is unable to verify the extent if any that the debtors are in default of their mortgage obligations. It is denied that the movant is not adequately protected in that the value of the home exceeds the level of encumbrance against the same.
6. DENIED: Counsel for the debtors cannot ascertain the prospective intentions of the movant to file an amended proof of claim.
7. ADMITTED: Counsel for the debtor has incorporated post-petition mortgage arrearages that were brought to his attention by the mortgage company but cannot

ascertain the extent of any post petition mortgage arrearages beyond the months of March of 2018.

8. ADMITTED: However this does not serve as an adequate basis for the request of relief from the automatic stay.
9. DENIED: This request should be denied to the extent it would cause irreparable harm to the debtors,
10. DENIED: The debtors do not intend to convert their case to a Chapter 7 but rather intend to retain possession and ownership of their home.
11. DENIED: The debtor have sufficient income to fund the underlying plan of repayment and make the requisite mortgage payments.
12. DENIED: There is sufficient equity in the premises to serve as adequate protection to

WHEREFORE, the debtor respectfully requests that the Honorable Court:

Deny the movant's Motion for Relief from the Automatic Stay.

Deny Movant's request to waive Rule 4001(a)(3)

Deny the survival of the stay upon conversion

3/21/2018

Respectfully submitted,

s/s Gregory S. Hazlett, Esquire
Gregory S. Hazlett, Esquire
7 West Main Street
Mechanicsburg, PA. 17055
Phone: (717)-790-5500